

EXHIBIT 7

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CAROL DOUGHERTY, :
PLAINTIFF : CASE NO.: 1:04CV1682
: JUDGE KANE
V :
: CIBER, INC., :
DEFENDANT :

DEPOSITION OF: CAROL DOUGHERTY

TAKEN BY: DEFENDANT

BEFORE: DIANE F. FOLTZ, RMR
NOTARY PUBLIC

DATE: FEBRUARY 3, 2005, 10:06 A.M.

PLACE: RHOADS & SINON, LLP
ONE SOUTH MARKET SQUARE
HARRISBURG, PENNSYLVANIA

APPEARANCES:

STROKOFF & COWDEN, P.C.
BY: ELLIOT A. STROKOFF, ESQUIRE

FOR - PLAINTIFF

RHOADS & SINON, LLP
BY: ROBERT J. TRIBECK, ESQUIRE

FOR - DEFENDANT

ALSO PRESENT:

ANN E. GRIFFITHS



Page 206

Page 208

1 Q Did she ask you if you were prepared?
 2 A She asked me why I did not present the document
 3 to Terry in advance.
 4 Q And what was your response?
 5 A I don't recall what my response was, but I did
 6 not have the ability to give Terry the document.
 7 Q Why didn't you e-mail it to her?
 8 A I didn't have an e-mail connection.
 9 Q Didn't you have the AOL account?
 10 A Yes, but we were in the process of moving, and I
 11 was not in my home.
 12 Q On the 20th and 21st and 22nd you still weren't
 13 in your home?
 14 A We were in our home. I did not have connectivity
 15 to the best of my recollection.
 16 Q On any one of those three days could you have
 17 come to the office?
 18 A No.
 19 Q Why not?
 20 A It was too inconvenient.
 21 Q What were you doing -- I know that the seminar
 22 was two of those three days. What were you doing on the
 23 third day?
 24 A Probably still moving.
 25 Q Had you been scheduled off for that day?

1 Ms. Griffiths reference the comment you made about the
 2 misclassification of employees?
 3 A No.
 4 Q Did you reference it?
 5 A I don't think so.
 6 Q Did you suggest to her that you thought that's
 7 why she was firing you?
 8 A No.
 9 Q At the time is that what -- did you think that's
 10 why she was firing you?
 11 A I did not at the time. I did not know.
 12 Q When did you start thinking that?
 13 A I don't recall. It was sometime afterward, when
 14 I thought about everything that had transpired.
 15 Q What made you believe that that comment made her
 16 fire you?
 17 A I thought it was -- when I reflected back on the
 18 meeting and her reaction to it and the timing.
 19 Q What was the reaction?
 20 A It was just very surprised and told me that
 21 corporate knew it, you know, just the way she reacted.
 22 Q She wasn't angry?
 23 A I don't know. She didn't appear angry.
 24 Q She didn't yell?
 25 A No.

Page 207

Page 209

1 A Yes.
 2 Q Do you remember what day it was?
 3 A No. I thought I did until I looked at the
 4 calendar.
 5 Q When it became clear that you were being
 6 terminated, did you ask Ms. Griffiths if you could stay in
 7 your current job or in your prior job?
 8 A No.
 9 Q Did you ask her if you could stay on until the
 10 end of the year?
 11 A Yes, I did.
 12 Q Did you ever -- do you ever remember telling Ms.
 13 Griffiths during that meeting that she had no idea what you
 14 were going through?
 15 A I may have.
 16 Q What were you going through?
 17 A I was very busy with work, with the move, the
 18 conference, planning for this, the golf outing, and
 19 basically just very busy.
 20 Q Anything else that was causing you particular
 21 angst during that period?
 22 A I knew that there was issues with the negative
 23 feedback that Ann had told me there was, and that was
 24 pressing on my mind, yes.
 25 Q During that meeting on the 24th at any time did

1 Q And she suggested that you had to take that up
 2 with Dave Plisko, correct?
 3 A With corporate she said.
 4 Q You understood it to be Dave Plisko?
 5 A Yes.
 6 Q After reflecting on that you determined that you
 7 believed that that's why she fired you?
 8 A After reflecting on that situation, I contacted
 9 the attorney and had a consultation with him.
 10 Q And I don't want you to talk at all about what
 11 you talked to your attorney about, so if I ask a question
 12 that's going to cause you to answer what you and
 13 Mr. Strokoff or one of his colleagues talked about, I want
 14 you not to answer it, okay?
 15 A Uh-hum.
 16 Q Why did you decide to consult an attorney?
 17 A Because I did not believe that I would deserve to
 18 be fired.
 19 Q At the time you decided to consult an attorney,
 20 did you believe that you were fired because of this
 21 comment?
 22 A When I documented the timeline of things that had
 23 occurred, I did think that that could be a possibility.
 24 Q Did Ms. Griffiths say anything on the 24th that
 25 made you believe that?